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April 3, 2025

**BY ECF**

The Honorable Vernon S. Broderick, U.S.D.J.  
United States District Court, S.D.N.Y.  
40 Foley Square  
New York, NY 10007

**Re:   *Standard Insurance Company v. Minnesota Life Insurance Company et al.***  
**Case No.: 25-cv-0212 (VSB)**

Dear Judge Broderick:

Standard Insurance Company (“The Standard”) writes to respectfully request, with the consent of Minnesota Life Insurance Company and Securian Financial Group, Inc. (collectively, the “Securian Entities”): (i) clarification from the Court regarding the ECF error entered on the docket on March 18, 2025, and (ii) an extension of the time for the Securian Entities to respond to the Amended Complaint.

On March 4, 2025, the Court extended the deadline for The Standard to file an Amended Complaint or for the Securian Entities to Answer to March 17, 2025. ECF No. 16. Accordingly, on March 17, The Standard timely filed its Amended Complaint as well as a motion to redact the Amended Complaint and seal its exhibits. ECF Nos. 17-19.

On March 18, an ECF error message reading “Notice to Attorney Regarding Deficient Pleading” was entered onto the docket in connection with the unredacted copy of the Amended Complaint, even though The Standard’s Amended Complaint was timely filed. The Notice stated, “The filing is deficient for the following reason(s): Court’s leave has not been granted.” That same day, the Managing Attorney’s Office for counsel for The Standard contacted the Court’s ECF Clerks to inquire about the issue. The Court’s ECF Clerks indicated that the ECF error would be resolved when the Court ruled on The Standard’s motion to seal (ECF No. 17).

Accordingly, The Standard respectfully requests clarification from the Court with regard to the “Notice to Attorney Regarding Deficient Pleading.” In the event that the Court determines that The Standard requires a further extension for its Amended Complaint to be timely, The Standard respectfully requests such an extension, to which the Securian Entities consent.

The parties further request that the Court grant the Securian Entities leave to file their Answer to the Amended Complaint within 14 days of the Amended Complaint being accepted by the Court and served.

Respectfully submitted,

/s/ Susan Reagan Gittes

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**APPLICATION GRANTED  
SO ORDERED   
VERNON S. BRODERICK  
U.S.D.J.**

Date: April 4, 2025

On March 17, 2025, Plaintiff requested (1) to file an unredacted amended complaint under seal and (2) to file an amended complaint with redactions on the public docket, due to sensitive business information. (Doc. 17.) Plaintiff then proceeded to do so. (See Docs. 18-19.) These requests are GRANTED. Accordingly, the ECF error message of March 18, 2025 is resolved.

The parties' request for the Defendants to file their Answer or otherwise respond to the Amended Complaint within 14 days is GRANTED. (See Doc. 24.)

The Clerk of Court is respectfully directed to terminate Documents 17 and 24.